

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SMART VENT PRODUCTS, INC.,	:	CIVIL ACTION
	:	
Plaintiff,	:	1:13-CV-05691-JHR-KMW
	:	
v.	:	
	:	
CRAWL SPACE DOOR SYSTEM INC.,	:	
d/b/a CRAWL SPACE DOOR SYSTEMS,	:	
INC.	:	
	:	
Defendant.	:	

AFFIDAVIT IN COMPLIANCE WITH L.CIV.R. 37(B)(1)

I, Siobhan K. Cole, declare under penalty of perjury:

On October 18, 2019, at the end of the seventh day of trial in this matter, counsel for Smart Vent represented to the Court and counsel for Crawl Space Doors that Smart Vent intended to produce pictures and videos of testing that Smart Vent conducted on Crawl Space Doors' flood vent, which Smart Vent did not produce in discovery.

In response, counsel for Crawl Space Doors requested that Smart Vent produce all documents and information in Smart Vent's possession or control regarding the testing and not simply the select videos and pictures counsel for Smart Vent was referencing.

At 7:15 p.m. yesterday evening, I received an electronic file containing three videos and 18 pictures regarding the testing of Crawl Space Doors' flood vent by Smart Vent.

At 8:17 p.m. yesterday, my partner Justin E. Proper demanded, via email, that Smart Vent produce all documents in its possession or control regarding the testing.

At approximately 2:15 p.m. today, October 18, 2019, I conferred with counsel for Smart Vent, regarding Crawl Space Doors' demand for additional information but Mr. DiMarino and I could not reach agreement.

Dated: October 18, 2019

WHITE AND WILLIAMS LLP

BY: /s/ Siobhan K. Cole
Siobhan K. Cole
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